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VIA ECF

Hon. LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Application of Doosan Heavy Industries and Construction Co., Ltd. for an Order Directing Discovery Pursuant to 28 U.S.C. § 1782, 1:19-mc-01638-LDH

Dear Judge DeArcy Hall:

We write on behalf of Petitioner Doosan Heavy Industries and Construction Co., Ltd. (“Petitioner”) regarding Petitioner’s pending *ex parte* application for an order directing discovery from Liberty Maritime Corporation pursuant to 28 U.S.C. § 1782 (“Application”).

We write merely to follow up on the Application, which has been pending since June 25, 2019, without any acknowledgement or action by the Court. We thank the Court for its consideration and are available at the Court’s convenience should the Court require any additional information from us.

Respectfully submitted,



James E. Berger